

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- v. -

LAWRENCE E. PENN, III, CAMELOT  
ACQUISITIONS SECONDARY OPPORTUNITIES  
MANAGEMENT, LLC, THE CAMELOT GROUP  
INTERNATIONAL, LLC, AND SSECURION LLC,

Defendants,

- AND -

A BIGHOUSE PHOTOGRAPHY AND FILM STUDIO  
LLC,

Relief Defendant.

**No: 14-CV-0581 (VEC)**

**NOTICE OF 60(b) MOTION  
FOR RELIEF FROM  
JUDGMENT AND ORDER**

**ECF CASE**

**PLEASE TAKE NOTICE**, that upon the filing the accompanying Memorandum of Law, Affidavit of Lawrence E. Penn III both in Support of Defendant's Rule 60(b) motion for relief and records of the proceedings, the Defendant respectfully moves pursuant to Federal Rules of Civil Procedure Rule 60(b) for Relief from Memorandum Opinion and Order dated October 1, 2018 as a matter of new information, new law, fairness and in the interest of justice.

**PLEASE TAKE FURTHER NOTICE** that pursuant to this Court's order of August 25, 2020, Dkt. No. 369, all papers submitted in opposition to this motion shall be filed with the Court and served on all parties on or before September 25, 2020.

**PLEASE TAKE FURTHER NOTICE** that oral argument will be on a date and at a time to be designated by the Court.

Dated: September 11, 2020  
New York, New York

Respectfully Submitted,



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